

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARM LTD.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 22-1146 (MN)
v.	)	
	)	<b>REDACTED – PUBLIC VERSION</b>
QUALCOMM INC., QUALCOMM	)	<b>Original Filing Date: July 10, 2024</b>
TECHNOLOGIES, INC. and NUVIA, INC.,	)	<b>Redacted Filing Date: July 22, 2024</b>
	)	
Defendants.	)	

**DECLARATION OF CATHERINE NYARADY IN SUPPORT OF DEFENDANTS’  
MOTION TO EXCLUDE ARM’S EXPERT OPINIONS**

I, Catherine Nyarady, declare under penalty of perjury that the following is true and correct:

1. I am an attorney at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel of record for Qualcomm Inc., Qualcomm Technologies, Inc. and Nuvia, Inc. (collectively, “Defendants”) in the above-captioned action. I am a member in good standing of the State Bar of New York and was admitted to practice before this Court *pro hac vice* on April 6, 2023. I am competent to testify to the matters stated herein, have personal knowledge of the facts and statements in this declaration, and each of the facts and statements is true and correct.

2. Attached hereto as **Exhibit 1**<sup>1</sup> is a true and correct copy of Appendix A, entitled Grounds for Exclusion of Arm’s Expert Opinions and Corresponding Paragraphs.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert Report of W. Todd Schoettelkotte dated December 20, 2023.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Reply Report of W. Todd Schoettelkotte dated March 25, 2024.

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<sup>1</sup> Exhibits have been highlighted by counsel to identify the cited material.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the July 2, 2024 Deposition of W. Todd Schoettelkotte.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Arm Holdings plc's FYE24 - Q2 Shareholder Letter dated November 8, 2023.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript of the December 12, 2023 Deposition of Rene Haas.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript of the October 27, 2023 Deposition of Will Abbey.

9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript of the November 9, 2023 Deposition of Paul Williamson.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the Expert Report of Guhan Subramanian dated December 20, 2023.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Expert Reply Report of Guhan Subramanian dated March 25, 2024.

12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the transcript of the April 18, 2024 Deposition of Guhan Subramanian.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the Expert Report of Ravi Dhar dated December 20, 2023.

14. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the transcript of the May 3, 2024 Deposition of Ravi Dhar.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the Expert Reply Report of Ravi Dhar dated March 25, 2024.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the Expert Rebuttal Report of Joel Steckel dated February 27, 2024.

17. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the transcript of the November 15, 2023 Deposition of Cristiano Amon.

18. Attached hereto as **Exhibit 17** is a true and correct copy of an article by Ryan Smith titled “Qualcomm Previews [REDACTED]” in AnandTech, dated October 24, 2023.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the Expert Reply Report of Shuo-Wei (Mike) Chen dated March 25, 2024.

20. Attached hereto as **Exhibit 19** is a true and correct copy of the Expert Report of Shuo-Wei (Mike) Chen dated December 20, 2023.

21. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts from the transcript of the June 25, 2024 Deposition of Shuo-Wei (Mike) Chen.

22. Attached hereto as **Exhibit 21** is a slipsheet for the true and correct copy of Shuo-Wei (Mike) Chen’s Beyond Compare RTL comparison produced with his Expert Report dated December 20, 2023, Bates numbered QCARM\_7517717.

23. Attached hereto as **Exhibit 22** is a true and correct copy of the Expert Rebuttal Report of Murali Annavaram dated February 27, 2024.

24. Attached hereto as **Exhibit 23** is a true and correct copy of an excerpt of the Arm Architecture Reference Manual (Arm ARM), Bates numbered ARM\_01324149.<sup>2</sup>

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<sup>2</sup> The complete version of Exhibit 23 is 8,696 pages and thus Defendants have only included an excerpt. Should the Court require it, Defendants will provide the complete document.

25. Attached hereto as **Exhibit 24-A** is a true and correct copy of an excerpt of the [REDACTED], Bates numbered QCARM\_2540979.
26. Attached hereto as **Exhibit 24-B** is a true and correct copy of the metadata overlay of the [REDACTED], Bates numbered QCARM\_2540979.
27. Attached hereto as **Exhibit 25** is a true and correct copy of the Expert Report of Robert Colwell dated December 20, 2023.
28. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts from the transcript of the June 28, 2024 Deposition of Robert Colwell.
29. Attached hereto as **Exhibit 27** is a true and correct copy of the Nuvia ALA dated September 27, 2019, Bates numbered ARM\_00059183.
30. Attached hereto as **Exhibit 28** is a true and correct copy of the [REDACTED] to the Nuvia ALA dated March 27, 2020, Bates numbered ARM\_00057230.
31. Attached hereto as **Exhibit 29** is a true and correct copy of the Expert Report Regarding Qualcomm's Counterclaims of Murali Annavaram dated May 20, 2024.
32. Attached hereto as **Exhibit 30** is a true and correct copy of the Expert Rebuttal Report Regarding Qualcomm's Counterclaim of Robert Colwell dated June 10, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed this 10th day of July, 2024, in New York, New York.

/s/ Catherine Nyarady  
Catherine Nyarady

**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 10, 2024, upon the following in the manner indicated:

Anne Shea Gaza, Esquire  
Robert M. Vrana, Esquire  
Samantha G. Wilson, Esquire  
YOUNG, CONAWAY, STARGATT & TAYLOR LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Joyce Liou, Esquire  
Lydia Davenport, Esquire  
Daralyn J. Durie, Esquire  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Erik J. Olson, Esquire  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, CA 94304  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Scott F. Llewellyn, Esquire  
Sarah E. Brickey, Esquire  
MORRISON & FOERSTER LLP  
4200 Republic Plaza  
370 Seventeenth Street  
Denver, CO 80202-5638  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Daniel P. Muino, Esquire  
Reebhl G. El-Hage, Esquire  
David Nathaniel Tan, Esquire  
MORRISON & FOERSTER LLP  
2100 L Street, NW, Suite 900  
Washington, D.C. 20037  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Nicholas Rylan Fung, Esquire  
MORRISON & FOERSTER LLP  
707 Wilshire Boulevard  
Los Angeles, CA 90017  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Kyle W.K. Mooney, Esquire  
Kyle D. Friedland, Esquire  
MORRISON & FOERSTER LLP  
250 West 55th Street  
New York, NY 10019  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Michael J. DeStefano, Esquire  
MORRISON & FOERSTER LLP  
600 Brickell Avenue, Suite 1560  
Miami, FL 33131  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

*/s/ Jennifer Ying*

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Jennifer Ying (#5550)